

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,¹

Debtors.

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

THE OFFICIAL COMMITTEE OF UNSECURED
CREDITORS OF THE COMMONWEALTH OF
PUERTO RICO,

as agent of

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO,

Plaintiff,

v.

BETTINA WHYTE,

as agent of

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE PUERTO RICO SALES TAX FINANCING
CORPORATION,

Defendant.

Adv. Proc. No. 17-00257

¹ The Debtors in these jointly-administered PROMESA title III cases, along with each Debtor's respective title III case number listed as a bankruptcy case number due to software limitations and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are: (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (Bankruptcy Case No. 17 BK 3284) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric and Power Authority (Bankruptcy Case No. 17 BK 4780) (Last Four Digits of Federal Tax ID: 3747).

**URGENT MOTION OF THE OFFICIAL COMMITTEE OF
RETIRED EMPLOYEES OF THE COMMONWEALTH
OF PUERTO RICO FOR EXPEDITED CONSIDERATION OF THE
SETTLEMENT DEADLINE MOTION**

The Official Committee of Retired Employees of the Commonwealth of Puerto Rico (the “**Retiree Committee**”) respectfully files this urgent motion (the “**Urgent Motion**”) to expedite consideration of the Retiree Committee’s motion (“**Settlement Objection Deadline Motion**”), filed contemporaneously herewith, for entry of an order changing the deadline to file objections to the *Motion Pursuant to Bankruptcy Rule 9019 for Order Approving Settlement Between Commonwealth of Puerto Rico and Puerto Rico Sales Tax Financing Corporation* (the “**Settlement Motion**”) [Dkt No. 4067]:

BACKGROUND

1. As set forth in the Settlement Objection Deadline Motion, the Settlement Objection Deadline of November 16, 2018 at 4:00 p.m. (Atlantic Standard Time) does not provide parties in interest a sufficient and appropriate opportunity to respond to the Settlement Motion and does not comply with the Seventh Amended Case Management Procedures [Dkt. No. 4086].

2. The Retiree Committee files this Urgent Motion so that the Settlement Objection Deadline Motion may be considered in advance of the current Settlement Objection Deadline of November 16, 2018, and if the Court determines a hearing is required, at the November 7, 2018 omnibus hearing.

RELIEF REQUESTED

3. By this Urgent Motion, the Retiree Committee respectfully requests the Court expedite consideration of the Settlement Deadline Motion.

**CERTIFICATION PURSUANT TO LOCAL RULE 9013-1 AND SECTION I.H OF THE
SEVENTH AMENDED CASE MANAGEMENT PROCEDURES**

4. Pursuant to Local Rule 9013-1(a), the Retiree Committee certifies that it has carefully examined the matter and concluded that there is a true need for the Court to expedite consideration of the Settlement Objection Deadline Motion to provide a sufficient and appropriate opportunity for parties in interest to respond to the Settlement Motion.

5. The Retiree Committee further certifies that it has not created the urgency through lack of due diligence. The Settlement Motion and Settlement Notice were filed on October 19, 2018, and the Retiree Committee has worked in earnest with the Oversight Board to resolve this issue without motion practice or a hearing. The Retiree Committee consents to the Court's entry of an order granting the relief requested in the Settlement Objection Deadline Motion without the need for hearing, but if the Court determines a hearing is required to determine the Settlement Deadline Motion, the Retiree Committee requests to be heard at the November 7, 2018 omnibus hearing.

6. Pursuant to Section I.H. of the Seventh Amended Case Management Procedures, the Retiree Committee certifies that it has engaged in reasonable, good-faith communications with interested parties.

WHEREFORE, the Retiree Committee respectfully requests the Court expedite consideration of the Settlement Objection Deadline Motion.

October 26, 2018

JENNER & BLOCK LLP

By:

/s/ Robert Gordon

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Respectfully submitted,

BENNAZAR, GARCÍA & MILIÁN, C.S.P.

By:

/s/ A.J. Bennazar-Zequeira

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